

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**JERMAINE DOCKERY, et al.,**

**Plaintiffs,**

**v.**

**Civil Action No. 3:13-cv-00326-WHB-JCG**

**PELICIA HALL, et. al.,**

**Defendants.**

**PLAINTIFFS' EMERGENCY MOTION TO COMPEL PRODUCTION OF  
DOCUMENTS**

COME NOW, the Plaintiffs, by and through their counsel of record, and respectfully file this Emergency Motion to Compel Production of Documents. Plaintiffs submit an accompanying Memorandum in Support of Plaintiffs' Emergency Motion to Compel. The parties have agreed to expedited briefing regarding this motion: Defendants will file their response to Plaintiffs' Motion to Compel within seven (7) days of the filing of the Motion, and Plaintiffs will file a reply (if any) three (3) days thereafter. In support of the Emergency Motion, Plaintiffs file the following exhibits:

1. Exhibit 1: Plaintiffs' Requests for Production and accompanying Sept. 14, 2018 cover letter from Elissa Johnson to Michael Bentley and Nicholas Morisani;
2. Exhibit 2: Letter from Michael Bentley to Elissa Johnson, Sept. 3, 2018;
3. Exhibit 3: Letter from Elissa Johnson to Michael Bentley, Sept. 7, 2018;
4. Exhibit 4: Letter from Nicholas F. Morisani to Elissa Johnson, Sept. 14, 2018; and
5. Exhibit 5: Good Faith Certificate, received from Nick Morisani Sept. 19, 2018

RESPECTFULLY SUBMITTED this 20th of September, 2018.

Mark P. Gimbel  
Erin Monju  
Covington & Burling LLP  
The New York Times Building  
620 Eighth Avenue  
New York, NY 10018  
Phone: 212-841-1000  
pgimbel@cov.com  
emonju@cov.com  
(admitted pro hac vice)

Gretchen Hoff Varner  
Covington & Burling LLP  
One Front Street  
San Francisco, CA 94111  
Phone: 415-591-6000  
ghoffvarner@cov.com  
(admitted pro hac vice)

Anna Q. Han  
Covington & Burling LLP  
850 Tenth Street, NW  
Washington, DC 20001  
Phone: 202-662-6000  
ahan@cov.com  
(admitted pro hac vice)

s/ Elissa Johnson  
Jody E. Owens, II, MS Bar #102333  
Elissa Johnson, MS Bar #103852  
Southern Poverty Law Center  
111 E. Capitol Street, Suite 280  
Jackson, MS 39201  
Phone: 601-948-8882; Fax: 601-948-8885  
jody.owens@splcenter.org  
elissa.johnson@splcenter.org

Eric G. Balaban  
Gabriel B. Eber  
National Prison Project of ACLU  
915 15th Street, NW, 7th Floor  
Washington, DC 20005  
Phone: 202-393-4930; Fax: 202-393-4931  
ebalaban@aclu.org  
geber@aclu.org  
ctakei@aclu.org  
(admitted pro hac vice)

Elizabeth Alexander  
Law Offices of Elizabeth Alexander  
1416 Holly Street NW  
Washington, DC 20012  
Phone: 202-291-3774  
elizabethalexander@lawofficesofelizabethalexander.com  
(admitted pro hac vice)

**CERTIFICATE OF SERVICE**

I, Elissa Johnson, hereby certify that a true and correct copy of the foregoing document was filed electronically. Notice of this filing will be sent by electronic mail to all parties by the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

SO CERTIFIED, this 20th day of September, 2018.

s/Elissa Johnson  
Elissa Johnson, MS Bar No. 103852